

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

LEK SECURITIES CORPORATION, SAMUEL LEK,
VALI MANAGEMENT PARTNERS d/b/a AVALON FA
LTD, NATHAN FAYYER, and SERGEY PUSTELNIK
a/k/a/ SERGE PUSTELNIK,

Defendants.

17-cv-01789 (DLC)

**DECLARATION OF STEVE M.
DOLLAR IN SUPPORT OF
DEFENDANTS' MOTION TO
EXCLUDE THE TESTIMONY
AND OPINIONS OF PUTATIVE
EXPERT NEIL PEARSON**

STEVE M. DOLLAR, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a partner in the law firm of Norton Rose Fulbright US LLP and counsel for Defendants Lek Securities Corporation (“LSC”) and Samuel Lek (together with LSC, the “Lek Defendants”) in the above-captioned matter. I submit this declaration in support of the Lek Defendants’ Motion pursuant to Rule 702 of the Federal Rules of Evidence to exclude the testimony and opinions of the Securities and Exchange Commission’s (the “SEC” or “Commission”) putative expert, Neil Pearson. The facts contained in this declaration are true and correct, and they are based upon my personal and firsthand knowledge.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Expert Report of Neil D. Pearson, Ph.D., dated March 16, 2018.

3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the Deposition Transcript of Neil D. Pearson, dated July 19, 2018.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the Rebuttal Report of David J. Ross Regarding the Alleged Cross-Market Manipulation Scheme, dated May 11, 2018.

5. Attached hereto as **Exhibit 4** is a true and correct copy of Exhibit 189 of the Deposition Transcript of Neil D. Pearson, dated July 19, 2018.

6. Attached hereto as **Exhibit 5** is a true and correct copy of Exhibit 193 of the Deposition Transcript of Neil D. Pearson, dated July 19, 2018.

7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from the Deposition Transcript of David Ross, dated July 26, 2018.

8. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from the Deposition Transcript of Jerry O'Connell, dated February 6, 2018.

9. Attached hereto as **Exhibit 8** is a true and correct copy of the Reply Expert Report of Neil D. Pearson, Ph.D. to the Rebuttal Report of David J. Ross Regarding the Alleged Cross-Market Manipulation Scheme, dated June 22, 2018.

10. Attached hereto as **Exhibit 9** is a true and correct copy of Exhibit 191 of the Deposition Transcript of Neil D. Pearson, dated July 19, 2018.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 24, 2018

/s/ Steve M. Dollar
Steve M. Dollar